

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Nested Bean, Inc.,

Plaintiff,

v.

U.S. Consumer Product Safety Commission,
et al.,

Defendants.

Case No. 1:25-cv-00389-RGA

**DEFENDANTS' UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants move under Federal Rule of Civil Procedure 6(b)(1) and Local Rule 16.4 for a 30-day extension of time to respond to Plaintiff's Complaint until September 4, 2025. Good cause exists for this request, as follows:

1. Plaintiff commenced this lawsuit on March 28, 2025. *See* D.I. 1. On June 9, 2025, this Court extended Defendants' deadline to respond to the Complaint until August 5, 2025, so the parties could discuss a resolution of this matter without further litigation.

2. Since then, the parties have exchanged settlement proposals and conferred via videoconference. Those conversations were productive, and the parties agree that discussions should continue. To allow the parties additional time to focus efforts on a potential resolution, Defendants respectfully request that the Court extend their deadline to respond to the Complaint to September 4, 2025.

3. Defendants' counsel conferred with Plaintiff's counsel, who represented that Plaintiff does not oppose the requested extension.

Accordingly, Defendants respectfully request an extension to September 4, 2025, of their deadline to file a response to Plaintiff's Complaint. A proposed order is attached.

Dated: July 29, 2025

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Respectfully submitted,

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